

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

RUFUS BOUDREAUX

PLAINTIFF

VERSUS

Civil Action No. _____

MISSISSIPPI DEPARTMENT OF CORRECTION, CENTURION of Mississippi

William BRAZIER, L. SUTTON

DEFENDANTS

FAC TUAL ALLEGATION

Respectfully Submitted,
By Rufus Boudreaux
RUFUS BOUDREAUX # 2079/8

Exhibit-B'

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WILLIAM BRAZIER, L. SUTTON
DEFENDANTS

FACTUAL ALLEGATION

COME NOW, RUFUS BOUDREAUX #207918, with his Complaint
of Improper Medical Care And Treatment,

BOUDREAUX contend that the responsible William BRAZIER,
M.D. and L. SUTTON, Employed by CENTURION of MISSISSIPPI AND
M.D.D.C.,

WERE indifference, BOUDREAUX has BEEN mistreated and his
condition has worsened, because of doctor William BRAZIER and doctor
L. SUTTON malpractice has left BOUDREAUX confine to a wheel chair,
when he was up walking well and in better health before his

1. Exhibit - 'B'

INCARCERATION UNDER THE MEDICAL CARE OF MISSISSIPPI DEPARTMENT OF CORRECTIONS,

BOUDREAUX CONTEND THAT DR. BRAZIER AND DOCTOR L. SUTTON DECISION TO ALLOW HIM TO BE SEEN BY THEIR NURSE PRACTITIONERS TO SEE HIM, DIAGNOSE HIM, AND ORDER HIM THE INCORRECT MEDICATION THAT CAUSE HIS STIMULATOR TO SHOCK HIS HEART SEVERAL TIMES.

BOUDREAUX PUT IN NUMEROUS SICK CALLS ABOUT THE MEDICATION CAUSING HIS STIMULATOR TO SHOCK HIS HEART AND IT WAS TWO WEEKS BEFORE HIS SICK CALL WAS ANSWERED. "UNDER THE EIGHTH AMENDMENT CONDITION OF CONFINEMENT IN STATE PRISONS MUST BE 'HUMANE' AND 'MUST' NOT INVOLVE THE WANTON AND UNNECESSARY INFLICTION OF PAIN" PALMER VS. JOHNSON, 193 F.3d 346, 351-52 (5th Cir. 1999) (quoting RHODES VS. CHAPMAN, 452 U.S. 337, 347, 101 S.Ct. 2392, 69 L.Ed.2d 59 (1981) AND FARMER VS. BRENNAN, 511 U.S. 825, 832, 114 S.Ct. 1970, 128 L.Ed.2d 811 (1994))

BOUDREAUX LAID IN HIS BED WITH HIS HANDS, ARMS AND LEGS SWOLLEN ALMOST TO BURST FROM RECEIVING THE WRONG GOUT MEDICATION,

BOUDREAUX COMPLAINT CONCERNS A PRESENT AND CONTINUING HARM CAUSE BY DR. BRAZIER AND DOCTOR L. SUTTON, ACTS OF DELIBERATE INDIFFERENCE FROM NOT RECEIVING THE RIGHT MEDICATION WHICH CAUSE BOUDREAUX TO ENDURE INFLICTION OF UNNECESSARY AND WANTON PAIN, (quoting FARMER, 511 U.S. AT 834, 114 S.Ct. 1970)

DOCTOR BRAZIER AND DOCTOR L. SUTTON, ACTED WITH DELIBERATE INDIFFERENCE, IN VIOLATION OF THE EIGHTH AMENDMENT, BECAUSE THEY KNEW THAT BY HAVING THEIR NURSE PRACTITIONER TO SUBSCRIBE BOUDREAUX

MEDICATION COULD CAUSE SUBSTANTIAL RISKS OR SERIOUS BODILY HARM IF THEY SUBSCRIBE BOUDREAUX THE WRONG MEDICATION. AND IN FACT THEY DID, CAUSING BOUDREAUX HEART TO BE SHOCKED OVER AND OVER FROM TAKING THE WRONG MEDICATION THAT COULD HAVE CAUSED BOUDREAUX HIS LIFE, BUT DOCTOR BRAZIER AND DOCTOR L. SUTTON, DISREGARDED THOSE RISKS BY FAILING TO TAKE REASONABLE MEASURES TO ABATE BOUDREAUX FROM ENDURING INFLECTION OF UNNECESSARY AND WANTON PAIN FROM THESE MEDICATION AS FOLLOWS:

SIMVASTATIN - 40MG

SOIRDMILASTONE - 50MG

FUROSEMIDE - 20MG

FIBERLAX - CAB TABS

SIMVASTATIN - 40MG

FOLIC ACID - 1MG

CARVEDILOL - 3.125MG

ASPIRIN - 81MG

ACETAMINOPHEN - 325MG

ENALAPRIL - 5MG

SIMVASTATIN ONE TAB